

parties or witnesses, or did any of them make any statement(s) to you or in your presence? If so, state the substance of any such conversation(s) or statement(s) and identify in whose presence it/they occurred.

ANSWER:

See response of Marilou Orgasan to this identical Interrogatory.

15. Identify every document you prepared, reviewed, assisted in the preparation of, or were otherwise associated with in the course of your involvement with the incident involving Plaintiff at or near his jail cell on March 26, 2016, and any other matter arising out of the instant *incident*, including, but not limited to, any and/or all medical records, statements, internal medical statements, reports or documents, and any other documents generated, and provide same as a production response.

ANSWER:

Gene Wilson's electronic health record has been produced. In addition, a document was prepared pursuant to the 2008 regulation implementing the Patient Safety and Quality Improvement Act of 2005. Corizon Health, Inc. objects to producing this document as it is, as provided for by the Act, privileged, confidential, and otherwise not discoverable as patient safety work product.

16. State how long and under what circumstances you knew any and/or all of the Corizon Health, Inc., employee's who were at or near decedent's jail cell on March 26, 2016, and state whether you ever discussed the decedent with any and all of these employees before and after March 26, 2016 death of decedent. If so, provide the dates and places of all such conversations; the verbatim or substantially verbatim account of all such conversations; and the names and addresses of all persons who were present for all such conversations.